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June 3, 2008

BY FACSIMILE AND ECF

Honorable Theodore H. Katz
United States Magistrate Judge
United States District Court for the
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Kathleen Mays, Ph.D. v. Washington Square Institute for Mental Health and
Psychotherapy and Gerd H. Fenchel, Ph.D., 07 CV 5976 (BSJ)(THK)

Dear Judge Katz:

This firm represents plaintiff Kathleen Mays, Ph.D. in the above-referenced action. By Order dated May 20, 2008, this action was stayed pending mediation and, if necessary, submission of a revised proposed pre-trial order. Pursuant to the May 20 Order, we write jointly with counsel for defendants, Washington Square Institute for Mental Health and Psychotherapy ("WSI") and Gerd H. Fenchel, Ph.D., to report on the status of this action.

On May 28, 2008, the parties participated in mediation, but did not resolve this action. The parties thus need to resume discovery. The parties previously exchanged documents and information. The parties are in the process of exchanging supplemental documents and information and obtaining documents from non-parties, including, without limitation, plaintiff's medical providers. The parties also are in the process of scheduling depositions on mutually agreeable dates. Plaintiff intends to conduct approximately eight depositions (some of which will be partial day depositions). In the interest of efficiency, the parties seek to obtain the supplemental and non-party documents before commencing depositions.

Accordingly, the parties hereby submit the following revised proposed pre-trial schedule, and respectfully request that it be so ordered. The proposed deadline for the completion of fact discovery accounts seeks to (1) ensure sufficient time to obtain documents from non-parties in advance of the depositions and (2) account for the number of intended depositions and the varying litigation and vacation schedules of the parties and their counsel from June through September 2008. The parties do not anticipate that they will need to request a further extension of the schedule.

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Completion of Fact Discovery: September 26, 2008

Service of Plaintiff's Expert Witness Report: October 31, 2008

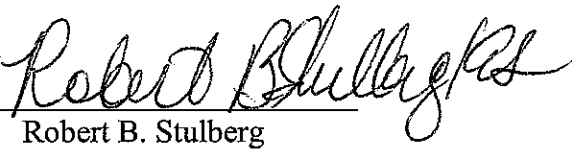
Service of Defendants' Responsive
Expert Witness Report: December 5, 2008

Completion of Expert Witness Depositions: January 9, 2009

Deadline for filing Dispositive Motions: February 6, 2009

The Court's considerations are appreciated.

Respectfully submitted,

By: 
Robert B. Stulberg

cc: Thomas Coppola, Esq. (by facsimile and ECF)